

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CHINA FISHERY GROUP LIMITED  
(CAYMAN), *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 16-11895 (JLG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND DEMAND  
FOR NOTICES AND SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby enters its appearance as counsel to Friedrich von Kaltenborn-Stachau, in his capacity as Insolvency Administrator (*Insolvenzverwalter*) (the “Insolvency Administrator”) of Pickenpack Production Lüneburg GmbH (“Pickenpack Production”), Pickenpack Europe GmbH (“Pickenpack Europe”), Pickenpack Holding Germany GmbH (“Pickenpack Holding”) and TST The Seafood Traders GmbH (“TST”, together with Pickenpack Production, Pickenpack Europe and Pickenpack Holding, the “Pickenpack Group”), creditor and party-in-interest in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and pursuant to, *inter alia*, Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Section 1109(b) of Title 11 of the United States Code, as amended (the “Bankruptcy Code”), requests that all notices given and all papers served or required to be served in the Chapter 11 Cases be given to and served upon:

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<sup>1</sup> The Debtors are N.S. Hong Investment (BVI) Limited, Super Investment Limited (Cayman), Pacific Andes International Holdings Limited (Bermuda), China Fishery Group Limited (Cayman), Smart Group Limited (Cayman), Protein Trading Limited (Samoa), South Pacific Shipping Agency Limited (BVI), CFG Peru Investments Pte. Limited (Singapore), China Fisheries International Limited (Samoa), Growing Management Limited (BVI), Chanery Investment Inc. (BVI), Champion Maritime Limited (BVI), Target Shipping Limited (HK), Fortress Agents Limited (BVI), CFGL (Singapore) Private Limited and Ocean Expert International Limited (BVI).

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**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Chapter 11 Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telex, e-mail or otherwise.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Demand for Notices and Service of Papers shall not be construed as an appointment of any person

or entity as authorized agents of the Pickenpack Group, either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Bankruptcy Rules or Rule 4 of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Pickenpack Group's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Pickenpack Group is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: August 10, 2016  
New York, New York

**CURTIS, MALLET-PREVOST  
COLT & MOSLE LLP**

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